

Appeal Ref: APP/C1435/W/23/3335625

LPA Ref: WD/2022/3222/MAO

**Land South of the A271 and east of
the A22, Lower Horsebridge,
Hailsham, East Sussex BN27 4DN**

Rebuttal to WDC Landscape Proof of Evidence

For the appellant: Hertfordshire Holdings
Ltd

**tor
&CO**

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1.0 INTRODUCTION AND SCOPE OF REBUTTAL EVIDENCE

1.1 This rebuttal proof of evidence has been prepared to respond to specific points raised in the proof of evidence of Ms Michelle Bolger acting as landscape witness on behalf of Wealden District Council (WDC) on planning matters.

1.2 It is limited to:

- Matters which are of relevance but have only arisen after the exchange of evidence, and
- Information contained in WDC's proofs that was not known (or could not reasonably have been discovered) at the time my original proof of evidence was prepared.

1.3 I do not respond in this rebuttal proof of evidence to every point raised in the landscape evidence of WDC or indeed points in the wider evidence of the Council on landscape matters. Rather, I respond here to the landscape points that I consider will most assist the Inquiry. The fact that I have not responded with a rebuttal to any other specific point in WDC's evidence should not in any way be taken that I accept that it is correct or that some concession is made.

1.4 This rebuttal has been prepared on the same terms as my main proof of evidence and it remains that the opinions expressed are my true and professional opinions given in accordance with the guidelines of my professional institution, the Landscape Institute.

2 Post POE submission correspondence

2.1 In the period following the submission of the POEs, I had some email correspondence with Ms Bolger on 3rd/4th April 2024 in which I requested clarification on the extent of character areas/landscape receptors identified by text but not defined on any plan in her POE. Ms Bolger kindly responded with clarification on both areas. I include the correspondence and the plan identifying one of those areas at Appendix R2 and have superimposed the other area on a copy of that plan at Appendix 7.

- 2.2 In that correspondence I also provided a summary of our landscape and visual assessment results and suggested that as there was a large degree of similarity in terms of assessed significance of visual impacts it might aid the inquiry to set out a joint table showing my and Ms Bolger's results. Ms Bolger volunteered to take my table and add her results to it.
- 2.3 In that correspondence I also provided more detail on the visualisation methodology and selection of visualisation option and its compliance with TGN Visual Representation of Development Proposals, Landscape Institute Technical Guidance Note 06/19 (CD9.6). This note is at Appendix R3.

3 Rebuttal Table

- 3.1 This rebuttal takes the form of a table setting out Ms Bolger's points raised which I consider require rebuttal in the second column and my response in the third column. Table/paragraph numbers of this rebuttal are in the first column.
- 3.2 Where more general points are to be made, the table includes that in a second column only.
- 3.3 Where my response requires reference to a document that is not included in WDC's or my POE, then I include that referenced document as an appendix.

WDC POE LANDSCAPE RESPONSE TABLE RT1

Rebut- tal Ref	WDC LANDSCAPE Points	PW Response
R-1	SECTION 1 of the WDC POE includes an introduction and refers to the tor&co LVA. This rebuttal section deals with those points.	
R-2	At paragraph 1.6.1 Ms Bolger states that tor&co's LVA refers to superseded LCA	The tor&co POE acknowledges this point. The LVA was carried out prior to May 2022. The 2014 assessment was extant at the time of writing. The landscape character per se has not changed significantly and as I demonstrate in my PoE in Section 5, the 2022 assessment description and evaluation does not relate to the area of landscape containing the appeal

		site and so the matter has no bearing on our assessment. In many respects, the 2014 assessment is more relevant than the 2022 assessment as it is based on a finer grain of assessed areas as illustrated in Figure 8 of the tor&co submitted LVA. The description of LVA E6 Hellingly accurately describes the southward views being '<i>dominated by the urban edges of Hailsham</i>'... In contrast, the 2022 assessment is at a large scale and fails to include the important detail of the urban edge landscape characteristics.
R-3	At paragraph 1.6.1 Ms Bolger states that tor&co does not carry out assessment of value in accordance with TGN 02/21 in the LVA.	I disagree with that assertion. tor&co do record the value the landscape character areas in the LVA and it is in accordance with the GLVIA3 and TGN 02/21. I refer to paragraphs 1.64, 1.70 and 1.76 of the LVA which assesses value for each of the landscape receptors. I acknowledge that the LVA text refers to the table in Figure 22 but this is necessarily a summary matrix informed by the fuller guidance clearly set out in the tor&co methodology in Appendix 2 of the LVA, paragraphs A2.34 to A2.39. The value may not be set out as a table, but there is no requirement to do this, particularly in an LVA which is a more informal version of an LVIA. Landscape Institute guidance note TGN 1/20 (Jan 2020) (rebuttal appendix R4), confirms the more informal process of an LVA stating '<i>an LVA does not require determination of</i>

		<i>'significance' and may generally hold less detail.'</i> In addition, paragraph 1.11 of the GLVIA states that the guidelines <i>'can also be used to assist in the 'appraisal' of forms of land use change or development that fall outside the requirements of the EIA Directive and Regulations'</i>. Therefore, this methodology follows the more informal process of a <i>'stand alone 'appraisal' but the essence of the approach of an LVIA still applies with exception of assessing the likely significance of effects'</i>.
R-4	Paragraph 1.6.2: Ms Bolger queries Photographic images (Type 1 Visualisations). Criticism of format used by tor&co in the LVA.	The LVA images are in accordance with the TGN guidance (Table 3 page 17) as Type 1 visualisations, appropriate for an LVA. They are to be printed at A1 size and at this size they are 100% enlargement panoramic cylindrical monocular images which I believe is more appropriate than the alternative A3 images with a single frame that would not fully capture the context, which is important in this proposal. Whilst for proposals viewed from a greater distance the single frame option is relevant, for a proposal like this where there are no significant views from the middle or long distance, the short distances involved result in the exclusion of too much of the context and would only show in some cases, a small amount of the proposals which would not be helpful.
R-5	Paragraph 1.6.4: Ms Bolger notes requested visualisations to assist the inquiry - makes assumption they are being prepared.	I agreed that the visualisations would assist the inquiry in response to Ms Bolger's request. The visualisation options for the appeal were considered. As they were being prepared it

		became clear that the requested format would not provide sufficient detail of the context and would in some cases not fully include the proposals. These reasons are outlined in my note 'Landscape Visualisation Compliance' (Appendix R3), mainly concerning the close viewing distance and subsequent relatively large field of view occupied by the proposals. At Appendix R1, I have prepared View 6 in the A3 single frame and panoramic format requested. For that view, due to the relatively restricted area of development seen, that format appears to show a reasonable area of context and although my preference would be an A1 format, I have in this instance prepared it as an example and to illustrate the change in that particular view to assist the inquiry.
R-6	SECTION 2 of WDC's PoE sets out the planning policy relating to this appeal.	
R-7	SECTION 3 sets out the landscape character assessments that relate to the appeal site. Although superseded by the 2022 landscape character assessment, the 2014 assessment could have been included in the listings, as it remains the most directly relevant assessment relating to the site due to its finer grain and accurate descriptions.	
R-8	SECTION 4 LANDSCAPE character of the site and context. R-8.1. In this section, Ms Bolger identifies the landscape receptors of the site and its landscape context. The areas are not identified in a plan in Ms Bolger's POE. However, following the correspondence described in paragraph 2.1 and contained in Appendix R2, Ms Bolger prepared a plan Figure 1A defining 'the site and its immediate landscape' and confirmed that the River Cuckmere Corridor (RCC) could be defined by the corridor that I show on my POE Figures 3 and 4 (flood zones 2 and 3). Ms Bolger's descriptions of these areas are set out here in some detail as these will be referred to in subsequent parts of this rebuttal. 'The River Cuckmere Corridor'	

	R-8.2. Ms Bolger confirms in her correspondence that paragraph 4.2.3 defines the River Cuckmere Corridor (RCC). This is reproduced in full for ease of later reference (my bold text): <i>'South of the site and south of the Lower Horsebridge Stream is the River Cuckmere corridor. The River Cuckmere Corridor consists of the River itself, the floodplain in which it is located, tributaries (such as the Lower Horsebridge Stream) and channels. There is no fixed boundary to the River Cuckmere corridor but the extent of the Flood 3 zone is a good indicator. The River Cuckmere corridor is the most distinctive landscape feature in the area. For example, the A271 crosses two separate channels of the Cuckmere between Lower Horsebridge and Hailsham.</i> This description provides some clarity as to the extent of the RCC and for the purposes of the assessment I assume that this could include some of the extensive areas of river corridor that extend north east of the site and also west of the A22. To assist the inquiry I have superimposed the RCC onto a copy of Ms Bolger's plan 1A at Appendix R7. The site and its immediate landscape R-8.3. In the correspondence following POE submissions, Ms Bolger provided a plan, Figure 1A (Appendix R2) clarifying the extent of the area described in her paragraph 5.2.2: <i>'This includes those parts of the wider landscape to which the site contributes, or which make a contribution to the site. It is this immediate landscape that development on the site has the potential to affect. In this case, the immediate landscape includes the River Cuckmere corridor and the valley of the Lower Horsebridge Stream lies both within the site and within the River Cuckmere corridor. There is inevitably some overlap. As the River Cuckmere corridor has been assessed separately care has been taken not to 'double count' the value.</i> R-8.4. The area above, defined on Ms Bolger's Figure 1A is similar to our LC1 (Figure 7 of my POE) area, but extends west of the A22 and north of the A271. My concern relating to this area is twofold. R-8.5. The first concern is that the River Cuckmere Corridor cuts right through the site and immediate area as defined on the plan in Figure 1A, so the area left after subtracting the Corridor land is composed of fragmented areas. This is more than just 'some overlap', it is fragmentation, and in my view, the fragmented parts do not form a coherent 'landscape'.
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	R-8.6. The European Landscape Convention defines landscape as “<i>an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors</i>” (Council of Europe, 2000) R-8.7. As a component defined by flood level, the part of the River Corridor that lies within the Figure 1A area (see Appendix R7) is not perceived as a landscape but is an integral component of that perceived wider landscape. R-8.8. My second concern is about the effect of the proposals on this character area. Ms Bolger and I agree that the intervisibility of the proposals and the area west of the A22, (exemplified by the views from the Weald Way) are minimal and that any views would result in negligible effects. For this reason, the effect of the proposals on the landscape character of this zone must be negligible and therefore this area of landscape does not contribute to the site and the proposal does not contribute to that area of landscape. R-8.9. Similarly, there is no meaningful intervisibility between the area north of the A271 and the site. The area on Figure 1A also extends deeply into the new housing zone at Welbury Meadows, Solent Crescent and Cuckmere Close but site fieldwork shows that the intervisibility is much less than shown. Nor is there any visibility from most of the included area of Lower Horsebridge. R-8.10. My view is that the area of intervisibility that would result in greater than small to negligible effects on views or landscape character are more accurately represented by the area shown in the figure at Appendix R5 of this rebuttal. 'The River Cuckmere Corridor' R-8.11. Returning to the defined River Cuckmere Corridor, the second concern is that although I disagree that this comprises a landscape, if one was to widen the definition to include the perceived wider landscape that visibly provides the setting of the valley corridor, that would comprise a landscape. I have set out in my POE (at paragraphs 3.40 to 3.44, referring to Figure 7 of my POE), how the areas of river corridor west of the A22 and north of the A271 (C1 and C3 in POE Figure 7) have a different context, setting and degree of sensitivity to the part within my defined area LC1.
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	R-8.12. LC1 in my view defines the setting of the section of River Corridor that is affected by the proposals. The areas of corridor to the east and west are unaffected.	
R-9	Paragraph 4.6.4 describes the River Cuckmere corridor as a strong barrier to further northward extension of Hailsham,	As described in my POE in Section 4, the expansion of Hailsham northwards, largely driven by WDC, skips the river corridor and in the area of the site, the corridor landscape, already strongly influenced by the urban edges will become an attractive naturalistic area of landscape within the wider north west Hailsham growth area.
R-10	Section 4.7 describes the POS at Welbury Meadows and Solent Crescent and points to the view towards the site as suggesting open countryside.	I agree that it is an attractive area of green space. I disagree that the views towards the site suggest open countryside and most residents using the space would know and observe that the view is truncated by the A271 and Boship roundabout and associated development. They would also be aware of the extensive area of mixed development along the A22 corridor at Lower Dicker beyond that and the Sports Hub that will create an urban glow in the backdrop to the view. Added to this, the WDC sponsored major employment site would remove any last vestige of open countryside in the area.
R-11	SECTION 5 LANDSCAPE VALUE. In Section 5, Ms Bolger assesses the landscape value of two landscape receptors: 'the site and its immediate landscape/context' and the 'River Cuckmere Corridor' I refer to the River Cuckmere Corridor as RCC hereon.	
R-12	Ms Bolger assesses the 'the site and its immediate landscape /context' in Table 2 on pages 35-37. R12.1. Although Ms Bolger says in paragraph 5.2.2 that the RCC is separately assessed, the assessment of the site and its landscape/context contains frequent references to the RCC. For instance: 'Natural heritage' refers to the stream valley which is part of the RCC and refers to the BOA also within the RCC.	

	'Cultural heritage' also contains reference to the course of the RCC. 'Distinctiveness' refers to the Lower Horsebridge Stream (part of the RCC). 'Recreational' refers to the POS in the RCC. R12.2. With all these RCC elements included within the assessment of the site and its landscape/context, this seems like double counting when looking at her Table 3.
R-13	Ms Bolger assesses the RCC in Table 3 on pages 38 to 40. R13.1. The key issue with the assessment of the RCC in Table 3 is that there is no definition of this other than Ms Bolger's confirmation (Appendix R2) that the extent of Flood Level 3 is a good indicator of its extent. As described by Ms Bolger in Sub-section 4.8 of her POE, the RCC is an extensive river corridor and the extent of the area that is included in the assessment is not defined. R13.2. If it is the part of RCC that is within the area of landscape affected by the proposals, then that would be a restricted area defined by me as LC1 but defined by Ms Bolger as the area shaded on her clarification plan Figure 1A in Appendix R2 of this rebuttal. R13.3. In rebuttal table references R8.8 to R8.10 above, I describe how the area shown on Figure 1A is inaccurate as it includes substantial areas where there is no intervisibility or relationship with the site. The area I show on plan R2, appendix R5 more accurately reflects the area within which the appearance of the proposals might affect landscape character. R13.4. If instead, the area of RCC assessed in Table 3 lies outside the area of landscape affected by the proposals (to avoid double counting) then I would conclude that regardless of the value of that area, it is not relevant to the assessment of value in relation to the assessment of landscape and visual impacts.
R-14	Notwithstanding my view that the RCC is a component of the landscape but not a landscape in itself and that the relevant part of it is already assessed as part of the site's immediate context/landscape in Ms Bolger's Table 2, in the following section of my table, I set out Ms Bolger's Table 3 assessment of value for each factor and the reasons why I disagree with them, together with my value assessment. I also refer to my Table 2 on pages 34-36 of my POE where much of what I set out in my valuation of LC1 is relevant to the assessment of the RCC.

	Please note an error in my POE Table 2 Assessment conclusion, where I refer to area LC2 rather than LC1 in the concluding summary table row. The overall value assessment of "Medium" still stands, but the summary text should read: 'The LC1 area performs well for Functional and Recreational factors but performs poorly for Perceptual (wildness) and associations. It performs moderately for the remaining factors'. Overall, the assessed value is Medium.	
R-15	Natural heritage - High	For the areas of RCC within the influence of the site, the ecology report (CD 1.11) reports on the low biodiversity value of the improved grassland that covers most of the northern side of the RCC. The BOA is not an indicator of ecological value, it defines areas where there is opportunity to improve biodiversity. My assessment is Medium.
R-16	Cultural heritage - Medium	There remains some time-depth to the landscape, but much change has occurred removing, fragmenting and obscuring the historic landscape. Brook House Grade II listed overlooks the area. Boship Hotel lost any meaningful relationship with the site decades ago. My assessment is Medium.
R-17	Landscape condition - High/Medium	Ms Bolger weighs the better condition landscape on the south bank against the more 'denuded' north bank, (both of which surely relate to the immediate site context, but then adds in the good condition of the RCC beyond the immediate site area, which is not relevant to the LVIA. My assessment is Medium.
R-18	Associations No score	This is unscored, but should be scored low as there are none known associations. My assessment is Low.
R-19	Distinctiveness High	Ms Bolger includes the areas where distinctiveness is 'strengthened' which again are outside the area relevant to the LVIA.

		The section of RCC relating to/affected by the site has a mixed identity of remnant rural elements and urban influence, so a mosaic of typologies, but not very distinctive. My assessment is Medium.
R-20	Recreational High/medium	Ms Bolger includes the same area of POS as the valuation of the site and immediate context in Table 2 but that only scored Medium. Nonetheless, my assessment is Medium/high as recreational areas appear popular and serve a relatively large population.
R-21	Perceptual (scenic) High/medium	Ms Bolger records 'few detractors' but the area of RCC relevant to the LVIA has detracting elements as recorded in her Table 2 for the site and immediate context. My assessment is Medium.
R-22	Perceptual (wildness and tranquillity) High/medium	Ms Bolger records noise is harmful to the RCC but fails to include light pollution/dark skies (which is a required assessment factor) and the close presence of highways and development in all directions. A Low score would be more appropriate. Factoring in the intense floodlighting of the adjacent Sports Hub and the future glow that will emanate from the nearby major employment site, the near future will be far removed from dark skies. My assessment is Low.
R-23	Functional High	This factor is largely to do with the 'healthy functioning' of the landscape. Whilst the RCC is an important part of the function, the significant areas of improved grassland within this part of the RCC do not have the requisite diversity and reduce its value. My assessment is Medium/high.
R-24	Paragraph 5.2.5 concludes the value of the RCC is high and so it is a valued landscape for the purposes of the NPPF.	My assessment of overall value is Medium. I refer to Section 8 paragraphs 8.12 to 8.21 of my POE where I set out my reasons for

		disagreeing that this area of landscape, whilst pleasant, is not a 'valued landscape'.
R-25	Section 6 of Ms Bolger's POE reviews the WDC documents that I review in my POE at Section 3; the Landscape Sensitivity Assessment Residential and Employment Development 2023 (Sensitivity Study) (LUC) (CD 9.2) and the Wealden District Council Strategic Housing and Economic Land Availability Assessment, February 2024 (SHELAA) (CD 6.8) I have made my points about the inconsistencies and flaws in those documents in Section 3 of my POE and the only additional points I have made below are in relation to some inaccuracies or different interpretations of the documents in Ms Bolger's POE, possibly arising from the flawed methodology and inconsistent scoring particularly in relation to Knights Farm.	
R-26	Paragraph 6.2.5 states that the overall sensitivity assessment is that the Hailsham West assessment unit has moderate-high sensitivity to the scale of development proposed (medium scale residential)	The assessment defines small scale residential as 2-2.5 storeys and medium scale as 3-4 storeys. The WDC methodology entirely misses out 2.5-3 storeys which is a very common form of development and in my view is closer to the small scale than medium scale. The proposed development is part 2-2.5 storeys and part 2.5-3. In my view that makes the development closer on average, to small scale.
R-27	Sub-section 6.4 briefly touches on the 2014 CBA assessment and quotes the Area 9 assessment.	Area 9 is extremely large and extends mostly into the rural areas, so the assessment is heavily weighted towards undeveloped areas and makes no mention of the urban influence of the section in the area of the proposals.
R-28	Section 7 of Ms Bolger's POE Assesses the landscape effects of the proposals. The following section of the table deals with each of Ms Bolger's points.	
R-29	Sub-section 7.2- detached nature of the site/area of development. Paragraph 7.2.1 queries which settlement the development relates to.	The site does not lie in the village area of Lower Horsebridge and as stated in Ms Bolger's paragraph 7.2.1, <i>'there is a clear separation between the development and Lower Horsebridge which has been increased in the latest revised Parameters Plan'</i>. The site also is not within the defined village area of Lower Dicker as shown in the Hellingly Neighbourhood Plan Map 5 on page 66 but is

		immediately adjacent to it and oddly the defined village area omits the houses on the A271 opposite the site, which are also adjacent to the defined village area. For these reasons, the site is visually and physically related to the Lower Dicker/ Boship settlement but also forms part of the transport hub development adjacent to the roundabout. Paragraphs 6.7 to 6.27 of my POE provides more detail on the design response to the development's context. The proposals also have a role in enclosing and contributing to the green infrastructure of the green space of LC1 in the same way that the developments on the south banks of the RCC do, as the photograph in Appendix R6 shows and as the photographs in my POE Figures 9 and 10 also illustrate.
R-30	Paragraph 7.2.2 states the design does not reflect the linear character and paragraphs 7.2.3 to 7.2.4 expand on that theme.	The development is not uncharacteristic of the form of development for instance at Welbury Meadows and Solent Crescent which address the same central open landscape of LC1. It is not adjacent to the historic linear development parts of Lower Dicker, as the Boship end of that settlement departs from that pattern. It is an appropriate scale and form of development in relation to the Boship roundabout and its function as a gateway to the north west Hailsham growth area, and this is set out in more detail in paragraphs 6.7 to 6.27 of my POE.
R-31	Paragraphs 7.2.5 and 7.2.6 states the site will appear as a separate detached housing estate in the countryside isolated from Hailsham and Lower Horsebridge.	As stated above, the proposals are adjacent to the Lower Dicker/Boship settlement area defined on Map 5 of the HNP and as such will be seen as a part of that development area soon to be expanded substantially by WDC

		(and in a way that is entirely at odds with the linear settlement pattern) as set out in Section 4 of my POE.
R-32	Sub-section 7.3- Design response to Flood and Noise. Paragraphs 7.3.1 to 7.3.5 are mostly comment and conjecture on the illustrative layout concluding that it will be uncharacteristic of the existing style of buildings or the settlement pattern,	I disagree that the proposals will be uncharacteristic of the local area. As an example, the photograph taken from the site looking south east towards Welbury Meadows in Appendix R6 shows how similar the proposals could appear to the existing development as illustrated in the Visualisations (Figures 16, 17, 18 and 19 in my POE and the visualisations for View 6 in Appendix R1). Section 6 of my POE, paragraphs 6.7 to 6.24 explain how the design responds appropriately to each of its contextual relationships. The illustrative masterplan is just one form of development that might arise. The parameter plan height zones allow considerable flexibility in terms of the detail design.
R-33	Paragraph 7.3.2 states no open space 'within' the built area.	This is just one illustrative layout, but the same approach is seen at Welbury Meadows and Solent Crescent where the landscape areas are all external wrapping around the developed core, probably responding to the best & most efficient use of land. It remains a detail matter, as the parameter plan does not preclude landscape within the parameter zones.
R-34	Sub-section 7.4- Harm to settlement edge. Paragraphs 7.4.1 to 7.4.7 include a range of points about the harming the transition from urban to countryside; how the development would not be perceived as part of any settlement.	Paragraph 8.29 of my POE deals with this matter. In addition, Sections 3, 4 and 5 of my POE including Figure 4 demonstrate that the area of the site is not countryside or rural and that WDC's Knights Farm Sports Hub and major employment site will remove the referred-to countryside and create a new settlement edge.

		The transition from urban to countryside is being moved by WDC to the area north of their developments. The area will be perceived as part of the north west Hailsham growth area centred on Lower Dicker and Boship The area of green open space defined by LC1 including the RCC may no longer be part of the wider countryside, but it will remain and develop as an attractive and biodiversity-rich open area of green and blue infrastructure within Hailsham.
R-35	Paragraph 7.4.4 and 7.4.5 - Proposals would harm the settlement edge of Lower Horsebridge and relationship with Hailsham.	Ms Bolger's paragraph 7.2.1, states <i>'there is a clear separation between the development and Lower Horsebridge which has been increased in the latest revised Parameters Plan'</i>. I agree, there is a clear separation and the gaps between developed areas are indicated on Figure 4 of my POE showing that for instance the gap between the proposed development and Welbury Meadows is greater than the gap between the edge of Lower Horsebridge and Solent Crescent. The gap between Lower Horsebridge and the proposals is equivalent to the gap between Lower Horsebridge and Hailsham. Paragraphs 6.22
R-36	Sub-section 7.5 describes lack of enclosure.	My POE at paragraphs 5.35 to 5.47 makes clear the distinction between the enclosure of the appeal site and the enclosure of the wider area of its river corridor setting. This localised enclosure substantially limits both the extent of both the visual and landscape effects, but also strongly defines the

		setting of the appeal site which I define as LC1 (Figure 7 of my POE). The localised enclosure is further illustrated in Appendix R 5 showing the approximate area of potential significant visibility of proposals.
R-37	Sub-section 7.6 describes harm to the RCC and how openness will be diminished	The openness in some view directions will be reduced, but the openness in those views is already curtailed by the A271 and visible development along it. Also, there is no perceived open countryside beyond the site. Any open countryside that exists beyond the service area and the A271 is set to be developed. In views from the gap between the development and Lower H, from the PRoW and from the development, that sense of openness will remain, although again, in this direction, the Sports Hub will remove the fields and connections with the countryside beyond.
R-38	Sub section 7.7 describes the landscape sensitivity of the Site and Immediate Landscape. This section of the table deals with Ms Bolger's main points	
R-39	Paragraph 7.7.3 Bullet 1 - Lack of connections with settlements	This point is made previously and is responded to in my rebuttal table references R-29, 30 and 31.
R-40	Paragraph 7.7.3 Bullet 2 - Uncharacteristic nature of Built form on the A271/Boship.	This point is made previously and is responded to in my rebuttal table reference R-32.
R-41	Paragraph 7.7.3 Bullet - Lack of enclosure.	This point is made previously and is responded to in my rebuttal table references R-36.
R-42	Paragraph 7.7.3 Proposals inconsistent with landscape guidance for LCA 3A	The landscape guidance in the 2022 landscape character assessment is based on the idea that this is a rural location with characteristics of Character Area LCA 3A. I have shown in my PoE on pages 27 to 29 in Table 1 Section 5, that it does not share those characteristics.

		The landscape is something else, it is rural /urban Fringe, and the design responds to that actual perceived and prevalent character. The WDC developments at Knights Farm are equally if not more so, at odds with the listed guidance and so WDC needs to be consistent in their application.
R-43	Assessment at paragraphs 7.7.5 and 7.7.6 '...harm derives largely from the lack of connection to existing settlements'	I disagree with the premise and reasoning of Ms Bolger's assessment. I have assessed the landscape susceptibility in my equivalent assessment of the impacts on LC1 in my POE at paragraph 7.12 and because the LC1 area is already enclosed and influenced by similar development, I have assessed it as low to medium susceptibility. I have set out in my POE at paragraphs 6.7 to 6.27 and the table above at R-29, 30 and 31, the reasons why I disagree with the statement that the harm derives largely from the lack of connection to existing settlements.
R-44	Sub-section 7.8 describes the landscape sensitivity of the River Cuckmere Corridor as a separate identified landscape. I have set out earlier in my rebuttal at R-12 to R24 how I believe Ms Bolger is double counting the effects on the RCC and how the area of RCC affected by the proposals must already be factored in to her assessment of the site and its immediate landscape. Appendix R7 makes clear the overlapping nature of the two landscape resources assessed. Notwithstanding the above, this section of the table deals with Ms Bolger's main assessment conclusions.	
R-45	At paragraph 7.8.1 Ms Bolger states the susceptibility of the RCC to the proposals is due to: • The loss of current connections to the wider landscape • Being sandwiched between two areas of development	In my POE at paragraphs 8.22 to 8.28 I demonstrate that the site has no meaningful connection with the wider landscape. The fact is the LC1 area is largely self-contained. regarding being sandwiched between two areas of development, this section of the RCC is already sandwiched between development to the south and north of the corridor and the

		proposals would make little difference to that prevailing character.
R-46	At paragraph 7.8.2 Ms Bolger assesses the RCC as having medium/high susceptibility, and factoring in high value, results in high sensitivity.	In rebuttal references R12 to R24 I set out in detail why I disagree with the assessment of the RCC as high value. I also disagree with the assessment of susceptibility as medium/high as the RCC is already subject to similar development as part of its enclosure and setting. For these two reasons I disagree with her assessment of high sensitivity.
R-47	At paragraph 7.8.2 Ms Bolger assesses the magnitude of change as medium/low adverse and together with the assessment of high sensitivity concludes the significance of effect would be moderate adverse.	Ms Bolger's assessment matches my moderate impact assessment for Construction and year 1. My assessment at Year 15 is slight to moderate impact as by that time, planting would have fully assimilated the proposed development with the appearance of the other existing developments. Whilst our assessed degree of significance of effects is similar, the reason for adverse effects is due to the increase in visible development and reduction in the area of open landscape, whilst Ms Bolger's reasons are the loss of connection to the wider landscape, and the RCC being 'sandwiched' between two areas of development, both of which I disagree with at rebuttal reference R-45.
R-48	Section 8 Effects on Visual Amenity Ms Bolger records similar visual effects to mine and although there are some differences in approach and Ms Bolger does not record the value of the view, or the susceptibility of the visual receptor, the assessment of significance for most of the receptors is mostly equivalent to mine. I do however disagree with her characterisation of the changes in the views, but these are for the same reasons as set out for landscape effects.	

	I disagree with her assessment of sensitivity for users of Footpath Hellingly 12/1 for the reasons I set out in my assessment in my LVA at paragraphs 1.97 to 1.102 summarised in my POE at table 6 pages 57 and 58. I do not disagree with her significance assessment. I also disagree with Ms Bolger's assessment of the effects on users of the POS at Welbury Meadows in which I assess the magnitude of change as less than Ms Bolger for the reasons set out in my LVA at paragraphs 1.89 and 1.90. These receptors already experience a lot of development in views and so although the proposals represent a significant increase in visible development, it would not be uncharacteristic of those existing views.
R-49	At Sub-section 8.7 paragraphs 8.7.1 to 8.7.3 Ms Bolger agrees with me that the effects of the proposals from the wider area will be either negligible or small. This confirms that significant visual effects are restricted to a very localised area.
R-50	At Sub-section 8.8 paragraphs 8.8.1 Ms Bolger takes my words in paragraph 1.124 of my LVA and I am not sure what point is being made. I reproduce the relevant part of paragraph 1.124 below and I am clear in that paragraph that I am describing the effects on views from the wider landscape, which both Ms Bolger and I agree would be of small or negligible significance from the few points in the wider landscape from which the site might be visible. <i>LVA paragraph 1.124 'The LVA studies show that, like effects on landscape character, effects on views are also very localised due to the enclosing effects of local vegetation and development. The studies also highlighted that existing views often include elements of the existing developments and major roads that form part of the landscape in the local area so that in many cases, the proposed development would not a be immediately noticeable or be at odds with the character of the wider views.'</i> I do not disagree that in the localised views the development would be immediately visible, although I disagree that it would be at variance with the existing character of the landscape and settlement character as set out in the previous points.